UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-62152-CIV-DAMIAN

MOTOROLA MOBILITY LLC, AND LENOVO (BEIJING) LIMITED,

Plaintiffs,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A,

Defendants.		
		/

[PROPOSED] FINAL DEFAULT JUDGMENT AND PERMANENT INJUNCTION

THIS MATTER comes before the Court on Plaintiffs' Motion for Entry of Final Default Judgment (the "Motion"). The Court granted the Motion in a separate Order. Pursuant to Federal Rule of Civil Procedure 58(a), the Court hereby **ENTERS THIS SEPARATE FINAL JUDGMENT**.

Accordingly, it is **ORDERED and ADJUDGED** that **Final Default Judgment is hereby entered** in favor of Plaintiffs, MOTOROLA MOBILITY LLC, and LENOVO (BEIJING) LIMITED ("Plaintiffs"), and against Defendants, the Individuals, Partnerships, or Unincorporated Associations identified on Schedule A hereto (collectively, the "Defendants") as follows:

(1) Permanent Injunctive Relief:

Defendants and their officers, directors, employees, agents, subsidiaries, distributors, and all persons acting in concert and participation with Defendants are hereby permanently restrained and enjoined from:

a. manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing

- goods bearing Plaintiffs' trademarks, or any confusingly similar trademarks identified in Paragraph 1 of the Complaint (the "MOTOROLA AND LENOVO Trademarks") (Dkt. 1);
- b. using the MOTOROLA AND LENOVO Trademarks in connection with the sale of any unauthorized goods;
- c. using any logo and/or layout that may be calculated to falsely advertise the services or products of the Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiffs;
- d. falsely representing themselves as being connected with Plaintiffs, through sponsorship or association;
- e. engaging in any act which is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of the Defendants are in any way endorsed by, approved by, and/or associated with Plaintiffs;
- f. using any reproduction, counterfeit, copy, or colorable imitation of the MOTOROLA AND LENOVO Trademarks in connection with the publicity, promotion, sale, or advertising of any goods sold by the Defendants;
- g. affixing, applying, annexing, or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent goods offered for sale or sold by the Defendants as being those of Plaintiffs or in any way endorsed by Plaintiffs;
- h. otherwise unfairly competing with Plaintiffs;
- i. using the MOTOROLA AND LENOVO Trademarks or any confusingly similar trademarks or works on e-commerce marketplace sites, domain name extensions, metatags, or other markers within website source code, from use on any webpage (including as the title of any webpage), from any advertising links to other websites, from search engines' databases or cache memory, and from any other form of use of such terms that are visible to a computer user or serve to direct computer searches to e-commerce stores, websites, and/or Internet businesses registered, owned, or operated by the Defendants; and
- j. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth above.
- (2) Additional Equitable Relief:

- a. Upon Plaintiffs' request, the Internet marketplace website operators and/or administrators for the Internet based e-commerce stores operating under the seller identification names identified on Schedule "A" hereto (the "Seller IDs"), including but not limited to Amazon, DHgate, eBay, Temu, Walmart, and Wish, shall permanently remove any and all listings and associated images of goods bearing counterfeits and/or infringements of the MOTOROLA AND LENOVO Trademarks via the e-commerce stores operating under the Seller IDs, and any other listings and images of goods bearing counterfeits and/or infringements of the MOTOROLA AND LENOVO Trademarks associated with the same sellers or linked to any other alias seller identification names or e-commerce stores being used and/or controlled by the Defendants to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of the MOTOROLA AND LENOVO Trademarks; and
- b. Upon Plaintiffs' request, any Internet marketplace website operator and/or administrator who is in possession, custody, or control of the Defendants' goods bearing one or more of the MOTOROLA AND LENOVO Trademarks, including but not limited to Alibaba.com, Hong Kong Limited, which operates the AliExpress.com platform, DHgate.com, eBay Inc., Etsy.com, SIA Joom, which operates the Joom.com platform, Walmart.com, and ContextLogic, Inc., which operates the Wish.com platform, shall permanently cease fulfillment of and sequester those goods, and surrender the same to Plaintiff.
- (3) Statutory damages in favor of Plaintiffs pursuant to 15 U.S.C. § 1117(c):
 - a. Award Plaintiffs damages of \$200,000.00 against each Defendant, for which let execution issue, based upon the Court's finding that the Defendants infringed at least one trademark on one type of good. The Court considered both the willfulness of the Defendants' conduct and the deterrent value of the award imposed, and the awarded amount falls within the permissible statutory range under 15 U.S.C. § 1117(c).
- (4) All funds currently restrained or held on account for all the Defendants by all financial institutions, payment processors, bank, escrow services, money transmitters, or marketplace platforms, including but not limited to, Alibaba.com, AliExpress.com, Zhejiang Ant Small and Micro Financial Services Group Co., Ltd. ("Ant Financial Services"), AliPay (China) Internet Technology Co. Ltd. and Alipay.com Co., Ltd. (collectively, "Alipay"), Amazon.com, Worldpay US, Inc. ("Worldpay"), Dunhuang Group which operates the DHgate.com and DHPay.com platforms, eBay.com, Etsy.com, SIA Joom, which operates the Joom.com platform

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("Joom"), Walmart.com, Wish, PayPal, Inc. ("PayPal"), Payoneer, PingPong, LianLian, OFX, and

their related companies and affiliates, are to be immediately (within 5 business days) transferred

by the previously referred to financial institutions, payment processors, bank, escrow services,

money transmitters, or marketplace platforms and by the Defendant, to Plaintiffs and/or Plaintiffs'

counsel in partial satisfaction of the monetary judgment entered herein against each Defendant. All

financial institutions, payment processors, bank, escrow services, money transmitters, or

marketplace platforms, including but not limited to Alibaba, AliExpress, Alipay, DHgate, Joom,

Wish, Wishpay, Amazon, Amazon Pay, eBay, Etsy, Walmart, PayPal, Payoneer, PingPong,

LianLian, OFX, and/or their related companies and affiliates, shall provide to Plaintiff at the time

the funds are released, a breakdown reflecting the (i) total funds restrained in this matter per

Defendant; (ii) total chargebacks, refunds, and/or transaction reversals deducted from each

Defendant's funds restrained prior to release; and (iii) total funds released per Defendant to

Plaintiff.

(5) Interest from the date this action was filed shall accrue at the legal rate. See 28

U.S.C. § 1961.

(6) The bond posted by Plaintiff in the amount of \$10,000.00 is hereby ordered released

by the Clerk.

(7) The Court retains jurisdiction to enforce this Final Default Judgment and Permanent

Injunction.

This is a Default Judgment SO ORDERED in Chambers at Fort Lauderdale, Florida, this

day of , 2025.

HONORABLE MELISSA DAMIAN UNITED STATES DISTRICT JUDGE

cc: counsel of record

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SCHEDULE A

DOE No.	Defendant Seller	Defendant Marketplace URL	Total Default Award
3	LGM DYstore	https://www.amazon.com/sp?seller=A332 CM5UHV8Z1D	\$200,000
5	shanxinaolubudianzis hangwuyouxiangongs i12	https://www.amazon.com/sp?seller=ASY K8HPV04IHN	\$200,000
7	abfl	https://www.dhgate.com/store/about-us/21748718.html	\$200,000
8	airpodusawarehouse	https://www.dhgate.com/store/about-us/21957333.html	\$200,000
9	awen845	https://www.dhgate.com/store/about-us/22003708.html	\$200,000
10	beatbud	https://www.dhgate.com/store/about-us/21961044.html	\$200,000
11	beauty_of_ting	https://www.dhgate.com/store/about-us/22002409.html	\$200,000
12	bluetooth1105	https://www.dhgate.com/store/about-us/21848450.html	\$200,000
13	dajianl	https://www.dhgate.com/store/about-us/21947230.html	\$200,000
14	ddmydesign	https://www.dhgate.com/store/about-us/21989855.html	\$200,000
15	ddmyhome	https://www.dhgate.com/store/about-us/21980114.html	\$200,000
16	eh7b	https://www.dhgate.com/store/about-us/21818482.html	\$200,000
17	electronicworlduu	https://www.dhgate.com/store/about-us/21709157.html	\$200,000
18	em7w	https://www.dhgate.com/store/about-us/21819805.html	\$200,000
19	esportset	https://www.dhgate.com/store/about-us/21885370.html	\$200,000
20	fansummer	https://www.dhgate.com/store/about-us/21804919.html	\$200,000
21	fqxt	https://www.dhgate.com/store/about-us/21819568.html	\$200,000
22	fzcte1	https://www.dhgate.com/store/about- us/21750745.html	\$200,000
23	fzctg7	https://www.dhgate.com/store/about- us/21751129.html	\$200,000
24	gp0b	https://www.dhgate.com/store/about- us/21800824.html	\$200,000

DOE No.	Defendant Seller	Defendant Marketplace URL	Total Default Award
25	gtc7	https://www.dhgate.com/store/about-us/21818443.html	\$200,000
26	highquality4supplier	https://www.dhgate.com/store/about-us/21956578.html	\$200,000
27	highquality5supplier	https://www.dhgate.com/store/about-us/21956580.html	\$200,000
28	highquality6supplier	https://www.dhgate.com/store/about-us/21956581.html	\$200,000
29	homepro3	https://www.dhgate.com/store/about-us/21979012.html	\$200,000
30	hpqg	https://www.dhgate.com/store/about-us/21818324.html	\$200,000
31	hvug	https://www.dhgate.com/store/about-us/21800622.html	\$200,000
32	i969	https://www.dhgate.com/store/about-us/21819080.html	\$200,000
33	kbd3	https://www.dhgate.com/store/about-us/21819709.html	\$200,000
35	linzhiqiang2	https://www.dhgate.com/store/about-us/21904856.html	\$200,000
36	linzhiqiang3	https://www.dhgate.com/store/about-us/21904874.html	\$200,000
37	lka2s	https://www.dhgate.com/store/about-us/21800509.html	\$200,000
38	lochig	https://www.dhgate.com/store/about-us/21964417.html	\$200,000
39	loukoe	https://www.dhgate.com/store/about-us/21947031.html	\$200,000
40	lpdiy	https://www.dhgate.com/store/about-us/21800478.html	\$200,000
41	ocf8	https://www.dhgate.com/store/about-us/21800567.html	\$200,000
42	omtyc	https://www.dhgate.com/store/about-us/21866172.html	\$200,000
43	ouzj	https://www.dhgate.com/store/about-us/21818430.html	\$200,000
44	podmax	https://www.dhgate.com/store/about-us/21961047.html	\$200,000
45	psyctradingInc	https://www.dhgate.com/store/about-us/21296670.html	\$200,000
46	pwlj	https://www.dhgate.com/store/about-us/21800877.html	\$200,000
47	qq3f	https://www.dhgate.com/store/about-us/21819360.html	\$200,000

DOE No.	Defendant Seller	Defendant Marketplace URL	Total Default Award
48	qywz	https://www.dhgate.com/store/about-us/21800786.html	\$200,000
49	smoktechvape	https://www.dhgate.com/store/about-us/20933785.html	\$200,000
50	suifengpiao20	https://www.dhgate.com/store/about-us/21946292.html	\$200,000
51	taa0	https://www.dhgate.com/store/about-us/21800736.html	\$200,000
52	tfxk	https://www.dhgate.com/store/about-us/21818675.html	\$200,000
53	ttre	https://www.dhgate.com/store/about-us/21800828.html	\$200,000
54	v4zf	https://www.dhgate.com/store/about-us/21819657.html	\$200,000
55	xemx	https://www.dhgate.com/store/about-us/21818326.html	\$200,000
56	xsqh	https://www.dhgate.com/store/about-us/21818422.html	\$200,000
57	yp6g	https://www.dhgate.com/store/about-us/21819027.html	\$200,000
58	yuming1	https://www.dhgate.com/store/about-us/21942803.html	\$200,000
59	zrgc023	https://www.dhgate.com/store/about-us/21951498.html	\$200,000
60	10000 Plus Sold Items	https://www.ebay.com/str/10000plussoldit ems	\$200,000
61	2013topteam	https://www.ebay.com/str/2013topteam	\$200,000
62	3cheadphonestore	https://www.ebay.com/usr/3cheadphonest ore	\$200,000
64	89era01	https://www.ebay.com/str/89era01	\$200,000
65	9irxx51	https://www.ebay.com/usr/9irxx51	\$200,000
66	acpower2022	https://www.ebay.com/str/acpower2022	\$200,000
71	amber.e-commerce	https://www.ebay.com/usr/amber.e- commerce	\$200,000
74	apstown	https://www.ebay.com/usr/apstown	\$200,000
75	aradines92-6	https://www.ebay.com/usr/aradines92-6	\$200,000
76	avista shop	https://www.ebay.com/usr/avista_shop	\$200,000
79	bravotech1983	https://www.ebay.com/str/bravotech1983	\$200,000
80	breezy s	https://www.ebay.com/usr/breezy s	\$200,000
82	buy_enjoy00	https://www.ebay.com/usr/buy_enjoy00	\$200,000
84	cheerbuy2023	https://www.ebay.com/usr/cheerbuy2023	\$200,000
87	colleyweed	https://www.ebay.com/usr/colleyweed	\$200,000
88	consumer-studio	https://www.ebay.com/str/consumerstudio	\$200,000

DOE No.	Defendant Seller	Defendant Marketplace URL	Total Default Award
89	curiosity-gadgets	https://www.ebay.com/usr/curiosity- gadgets	\$200,000
92	DIMA STORE	https://www.ebay.com/str/dimkhattab	\$200,000
93	discountcenter555	https://www.ebay.com/usr/discountcenter 555	\$200,000
99	e-youngzone	https://www.ebay.com/str/eyounglife	\$200,000
100	ezy_buy	https://www.ebay.com/usr/ezy_buy	\$200,000
101	faizanafzal	https://www.ebay.com/usr/faizanafzal	\$200,000
104	fodelight	https://www.ebay.com/str/fodelight	\$200,000
105	futuo_8354	https://www.ebay.com/usr/futuo 8354	\$200,000
107	Global Turkish Market	https://www.ebay.com/str/globalturkishm arket	\$200,000
108	Globalista Lifestyle	https://www.ebay.com/str/globalistalifesty le	\$200,000
110	happylikebuy	https://www.ebay.com/str/happylikebuy	\$200,000
111	hererun30	https://www.ebay.com/usr/hererun30	\$200,000
113	ibilios9	https://www.ebay.com/str/ibilios9	\$200,000
114	ironhide2017	https://www.ebay.com/str/ironhide2017	\$200,000
116	jayawas-0	https://www.ebay.com/usr/jayawas-0	\$200,000
119	JoyroomStoreAU	https://www.ebay.com/str/joyroomstoreau	\$200,000
120	judeebri99	https://www.ebay.com/usr/judeebri99	\$200,000
121	kaislaker	https://www.ebay.com/str/kaislaker	\$200,000
124	kiorsound	https://www.ebay.com/str/kiorsound	\$200,000
125	kriail1	https://www.ebay.com/usr/kriail1	\$200,000
127	laptop-battery-store	https://www.ebay.com/str/laptopbatterysto re	\$200,000
131	legou118	https://www.ebay.com/str/legou118	\$200,000
137	madisshop1	https://www.ebay.com/usr/madisshop1	\$200,000
138	mali04-3	https://www.ebay.com/usr/mali04-3	\$200,000
140	masrooj	https://www.ebay.com/usr/masrooj	\$200,000
141	meharadeem	https://www.ebay.com/usr/meharadeem	\$200,000
142	meinna 0	https://www.ebay.com/usr/meinna 0	\$200,000
144	mohaalfa75	https://www.ebay.com/usr/mohaalfa75	\$200,000
145	nagi_shop5	https://www.ebay.com/usr/nagi_shop5	\$200,000
146	namagh0	https://www.ebay.com/usr/namagh0	\$200,000
148	Newpower0816	https://www.ebay.com/str/newpower0816	\$200,000
149	next_electronics_stor	https://www.ebay.com/usr/next_electronic s store	\$200,000
151	online.shop.unix	https://www.ebay.com/str/onlineshopunix	\$200,000
153	palace_of_goods	https://www.ebay.com/usr/palace_of_goods	\$200,000
154	pasdil54	https://www.ebay.com/usr/pasdil54	\$200,000

DOE No.	Defendant Seller	Defendant Marketplace URL	Total Default Award
155	Power_Adapter_Sour	https://www.ebay.com/str/poweradapterso urce	\$200,000
156	prototypee	https://www.ebay.com/usr/prototypee	\$200,000
158	quality.dot	https://www.ebay.com/str/qualitydot0	\$200,000
159	qualitypower	https://www.ebay.com/usr/qualitypower	\$200,000
161	radseller5	https://www.ebay.com/usr/radseller5	\$200,000
162	ranweera 97	https://www.ebay.com/usr/ranweera 97	\$200,000
163	rayzlee	https://www.ebay.com/usr/rayzlee	\$200,000
164	ra-zad	https://www.ebay.com/usr/ra-zad	\$200,000
165	reff-84	https://www.ebay.com/usr/reff-84	\$200,000
167	rzdeal	https://www.ebay.com/str/rzdeal	\$200,000
168	sam ea	https://www.ebay.com/usr/sam_ea	\$200,000
169	seacrownwholesalers hop	https://www.ebay.com/usr/seacrownwhole salershop	\$200,000
173	smart_gear_links	https://www.ebay.com/usr/smart_gear_lin ks	\$200,000
175	summer_sky17	https://www.ebay.com/str/summersky17	\$200,000
181	thiediri-87	https://www.ebay.com/usr/thiediri-87	\$200,000
182	tolud2384	https://www.ebay.com/usr/tolud2384	\$200,000
183	topteamshop	https://www.ebay.com/usr/topteamshop	\$200,000
184	trendy_alley	https://www.ebay.com/usr/trendy alley	\$200,000
185	Uncle Sam's Shop	https://www.ebay.com/str/samhop	\$200,000
188	watchfulboutique	https://www.ebay.com/usr/watchfulboutiq ue	\$200,000
191	xinyue-power	https://www.ebay.com/str/mukizrepowerfl agshipstore	\$200,000
192	xlh-electronics	https://www.ebay.com/str/xlhelectronics	\$200,000
193	xyelec-41	https://www.ebay.com/str/xyelec41	\$200,000
195	yo_405649	https://www.ebay.com/usr/yo_405649	\$200,000
196	zucatuga	https://www.ebay.com/usr/zucatuga	\$200,000
197	MingGuang Mall local	https://www.temu.com/-mall-local-m-634418216533534.html	\$200,000
199	Whimsical Wanderlust	https://www.temu.com/whimsical- wanderlust-m-634418217265826.html	\$200,000
200	AceMonster	https://www.walmart.com/seller/1012237 08	\$200,000
202	Childlike Paradise	https://www.walmart.com/seller/1012562 30	\$200,000
203	Chnzic	https://www.walmart.com/seller/1016467	\$200,000
206	Feltree	https://www.walmart.com/seller/1011960 01	\$200,000

DOE No.	Defendant Seller	Defendant Marketplace URL	Total Default Award
207	floiliyvm9c2	https://www.walmart.com/seller/1024785	\$200,000
208	FSSMER	https://www.walmart.com/seller/1013290	\$200,000
209	guangzhoubaoruicany inyouxiangongsi	https://www.walmart.com/seller/1026018	\$200,000
210	hongfukeji	https://www.walmart.com/seller/1025760	\$200,000
211	JABUUO	https://www.walmart.com/seller/1016360	\$200,000
212	JOTOETYYS	https://www.walmart.com/seller/1025817	\$200,000
213	JZWLXX	https://www.walmart.com/seller/1024865	\$200,000
214	lalaxiaohumaoyi	https://www.walmart.com/seller/1025805	\$200,000
215	LanLaiShangMao	https://www.walmart.com/seller/1016324	\$200,000
217	MeiPingDianZi	https://www.walmart.com/seller/1025034	\$200,000
218	MinHou	https://www.walmart.com/seller/1025131	\$200,000
219	pinqinfang	https://www.walmart.com/seller/1025805	\$200,000
220	QYYA	https://www.walmart.com/seller/1024865	\$200,000
222	Self-timer	https://www.walmart.com/seller/1012550	\$200,000
223	shijianyinpindian	https://www.walmart.com/seller/1025908	\$200,000
224	sidajianweikeji	https://www.walmart.com/seller/1025796	\$200,000
225	Songsiqing Trading	https://www.walmart.com/seller/1025036	\$200,000
226	SYnong shop	https://www.walmart.com/seller/1024951	\$200,000
227	WNG	https://www.walmart.com/seller/1012270	\$200,000
229	YIQIMAI	https://www.walmart.com/seller/1015594	\$200,000
231	YQWLXX	https://www.walmart.com/seller/1024864 84	\$200,000
232	zhijiangshinenrongsh angmao	https://www.walmart.com/seller/1024866	\$200,000

DOE	Defendant Seller	Defendant Marketplace URL	Total Default
No.			Award
234	neom	https://www.wish.com/merchant/65918cc	\$200,000
		07c788a9cfbd11117	
235	TomTop	https://www.wish.com/merchant/52b4f71	\$200,000
	_	b796f6856bfedc840	
236	TurkishSouq	https://www.wish.com/merchant/62317f5	\$200,000
		81501a21f247f4b33	·